



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 18 2015

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

John DuBrock  
Director of Operations  
NACME Steel Processing, L.L.C.  
429 West 127<sup>th</sup> Street  
Chicago, Illinois 60628

Re: Notice of Violation  
NACME Steel Processing, L.L.C.  
Chicago, Illinois

Dear Mr. DuBrock:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to NACME Steel Processing, L.L.C. (NACME or you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating the Illinois State Implementation Plan at your Chicago, Illinois facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Molly Smith. You may call her at (312) 353-8773 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,



George T. Czerniak  
Director  
Air and Radiation Division

Enclosure

cc: Ray Pilapil, Manager, Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

IN THE MATTER OF: )  
 )  
NACME Steel Processing, L.L.C. ) NOTICE OF VIOLATION  
Chicago, Illinois )  
 )  
Proceedings Pursuant to )  
Section 113(a)(1) of the )  
Clean Air Act, 42 U.S.C. )  
§ 7413(a)(1) )

**NOTICE OF VIOLATION**

The U.S. Environmental Protection Agency (EPA) is issuing this Notice of Violation (NOV) under Section 113(a)(1) of the Clean Air Act (CAA), 42 U.S.C. § 7413(a)(1). EPA finds that NACME Steel Processing, L.L.C. (NACME) is violating the Illinois State Implementation Plan (SIP), as follows:

**Statutory and Regulatory Background**

1. Section 110(a)(1) of the CAA, 42 U.S.C. § 7410(a)(1), requires each state to adopt and submit to the EPA for approval a SIP that provides for the implementation, maintenance, and enforcement of the National Ambient Air Quality Standards (NAAQS). Under Section 110(a) of the CAA, 42 U.S.C. § 7410(a), each SIP must include a permit program to regulate the modification and construction of any stationary source of air pollution as necessary to assure that NAAQS are achieved. Pursuant to Section 113(a) and (b) of the CAA, 42 U.S.C. § 7413(a) and (b), upon EPA approval, SIP requirements are federally enforceable under Section 113.
2. Under 40 C.F.R. § 52.23, failure to, among other things, comply with any approved regulatory provision of a SIP, or with any permit condition issued pursuant to approved or promulgated regulations for the review of new or modified stationary sources, or with any permit limitation or condition contained within an operating permit issued under an EPA-approved program that is incorporated in a SIP, subjects the person so failing to enforcement action under Section 113, 42 U.S.C. § 7413.
3. EPA approved Illinois Pollution Control Board (IPCB) Rule 103(a) as part of the federally enforceable SIP for the State of Illinois on May 31, 1972, 37 Fed. Reg. 10862. IPCB Rule 103(a) has been recodified at 35 Ill. Admin. Code § 201.142.
4. The Illinois SIP at Rule 103(a)(1) [35 Ill. Admin. Code § 201.142] provides that no person shall cause or allow the construction of any new emission source or any new air pollution control equipment, or cause or allow the modification of any existing emission

source of air pollution equipment, without first obtaining a construction permit from the Illinois Environmental Protection Agency (IEPA).

5. On April 26, 2012, the IEPA issued NACME a construction permit under application number 12020035 (Construction Permit). The Construction Permit allows NACME to modify the existing steel coil pickling line to allow increase of the steel processing rate as described in the permit application.

### **Finding of Facts**

6. NACME owns and operates a steeling pickling plant at 429 West 127<sup>th</sup> Street, Chicago, Illinois (facility).
7. NACME pickles carbon steel with a maximum of a 12% hydrochloric acid (HCl) solution on one continuous process line.
8. NACME's Construction Permit at Special Condition 11.a. lists operating limits for the facility's scrubber in order to ensure HCl emissions do not exceed 0.1 pounds per hour and 0.44 ton per year. Specifically, Special Condition 11.a.v. requires scrubber make-up water flow of no less than 1.88 gallons/minute (gal/min) and Special Condition 11.a.vi. requires pressure drop across the scrubber of no more than 9.15 inches water column (w.c.).
9. NACME's Construction Permit at Special Condition 11.b. lists volatile organic material (VOM) usage and emission limitations for the facility's oil coater. Specifically, VOM usage is limited to 1.27 tons per month (ton/month).
10. EPA issued NACME a Section 114 Information Request (Information Request) on August 1, 2014.
11. EPA received a response to the Information Request from NACME in a letter dated October 3, 2014.
12. Request #4 in EPA's Information Request required NACME to provide an Excel workbook detailing the scrubber make-up water flow (gal/min) and pressure drop across the scrubber (in w.c.) at the facility from May 31, 2013 to May 31, 2014. As a part of NACME's October 3, 2014 response to the Information Request, NACME provided an Excel workbook referenced as Appendix B. A summary of Appendix B is presented in Tables 1 and 2 of Attachment A.
13. Table 1 summarizes all scrubber make-up water flow less than 1.88 gal/min at the facility from May 31, 2013 to May 31, 2014. Data was provided by NACME in readings of once per 8 hour shift or three readings a day.
14. Table 2 summarizes all pressure drop across the scrubber greater than 9.15 in w.c. at the facility from May 31, 2013 to May 31, 2014. Data was provided by NACME in readings of once per 8 hour shift or three readings a day.

15. Request #5 in EPA's Information Request required NACME to provide Material Safety Data Sheets (MSDS) to confirm the volatile organic compound (VOC) per liter contents of each of the facility's coatings. As part of NACME's October 3, 2014 response to the Information Request, NACME provided the following narrative:

The Quaker Quakerol MSDS shows VOC content as 12 grams/liter (equivalent to 0.012 kg VOC/liter). The Daubert NOx Rust MSDS does not show VOC content in the requested units. A calculation spreadsheet is also included in Appendix C which does show VOC content (0.107 kg/liter) based on information received from the manufacturer.

16. Request #6 in EPA's Information Request required NACME to provide an Excel workbook showing the names and quantities of all coatings used by the facility for each calendar month between May 1, 2009 and May 31, 2014.
17. A summary of the coating usages provided by NACME in response to Request #6 in EPA's Information Request are listed below in Table A.

**Table A:** Coating Usages for NACME's Oil Coater

Year	Month	Liters	Tons
2011	November	3,790	1.37
2012	June	3,441	1.37
2012	July	3,510	1.37
2012	October	4,260	1.38
2013	May	3,942	1.37
2013	June	3,949	1.37

### **Violations**

18. For 200 days between May 31, 2013 and May 31, 2014, NACME failed to maintain the scrubber water flow at the facility's scrubber at 1.88 gal/min or greater as required by Special Condition 11.a.v. in the Construction Permit. Attachment A, Table 1 lists the individual violations.
19. For 219 days between May 31, 2013 and May 31, 2014, NACME failed to maintain the pressure drop across the facility's scrubber at less than 9.15 in. w.c. as required by Special Condition 11.a.vi. in the Construction Permit. Attachment A, Table 2 lists the individual violations.
20. During one month in 2011, three months in 2012, and two months in 2013, NAMCE used coatings at the oil coater containing VOC's in excess of the VOM usage limit of 1.27 tons per month specified at Special Condition 11.b. in the Construction Permit. Table A lists the individual violations.

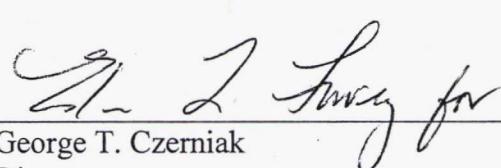
### Environmental Impact of Violations

21. These violations have caused or can cause excess emissions of VOCs which are directly related to ozone pollution. Breathing ozone contributes to a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame lung tissue. Repeated exposure may permanently scar lung tissue.

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Date

9/18/15

  
George T. Czerniak  
Director  
Air and Radiation Division

### Attachment A

**Table 1:** Scrubber water flow in gallons per min (gal/min) for periods of time between May 31, 2013 and May 31, 2014 when at least one shift reading was less than 1.88 gal/min. Scrubber water flow was below 1.88 gal/min on 200 days.

Date	Scrubber Water Flow (gal/min)		
	Shift 1 Reading	Shift 2 Reading	Shift 3 Reading
5/31/2013	1.82	1.80	1.82
6/1/2013	1.84	1.88	1.86
6/2/2013	1.81	1.89	1.84
6/3/2013	1.82	1.80	1.81
6/4/2013	1.82	1.84	1.79
6/5/2013	1.79	1.81	---
6/6/2013	1.82	1.80	10.81
6/7/2013	1.80	1.79	1.82
6/8/2013	1.80	1.80	---
6/10/2013	1.82	1.81	1.79
6/11/2013	1.82	1.80	1.79
6/12/2013	1.79	1.81	---
6/14/2013	1.81	1.80	1.80
6/15/2013	1.80	1.82	1.81
6/16/2013	1.86	1.82	1.81
6/18/2013	1.81	1.82	1.83
6/19/2013	1.81	1.82	1.81
6/20/2013	1.82	1.83	1.82
6/21/2013	1.83	1.83	1.82
6/22/2013	1.82	1.82	---
6/24/2013	1.75	1.61	1.64
6/25/2013	1.59	1.60	1.62
6/26/2013	1.68	1.77	1.76
6/27/2013	1.75	1.81	1.79
6/28/2013	1.78	1.78	1.80
6/29/2013	1.79	1.80	1.81
7/1/2013	1.79	1.77	1.79
7/2/2013	1.80	1.80	1.82
7/3/2013	1.79	1.81	1.78
7/8/2013	1.81	1.79	1.78
7/9/2013	1.81	1.82	1.83

7/10/2013	1.84	1.81	1.82
7/11/2013	1.81	1.79	---
7/12/2013	1.81	1.80	1.77
7/13/2013	1.81	1.82	1.83
7/15/2013	1.81	1.84	1.82
7/16/2013	1.80	1.82	1.81
7/17/2013	1.80	1.83	1.80
7/18/2013	1.81	1.80	1.82
7/19/2013	1.81	1.80	---
7/22/2013	1.77	1.78	1.77
7/23/2013	1.76	1.78	1.82
7/24/2013	1.78	1.79	1.80
7/25/2013	1.79	1.78	1.81
7/26/2013	1.79	1.80	1.77
7/27/2013	1.79	1.81	1.79
7/29/2013	1.80	1.79	1.81
7/30/2013	1.79	1.80	1.81
7/31/2013	1.79	1.81	1.77
8/1/2013	1.78	1.79	1.81
8/2/2013	1.80	1.79	---
8/5/2013	1.78	1.79	1.80
8/6/2013	1.79	1.79	1.79
8/7/2013	1.78	1.81	1.80
8/8/2013	1.82	1.83	1.82
8/9/2013	1.81	1.81	1.92
8/12/2013	1.87	1.85	1.83
8/13/2013	1.84	1.84	1.86
8/14/2013	1.85	1.79	1.83
8/15/2013	1.82	1.83	1.81
8/16/2013	1.82	1.81	1.81
8/19/2013	1.84	1.82	1.80
8/20/2013	1.85	1.84	1.80
8/21/2013	1.82	1.83	1.81
8/23/2013	1.82	1.80	1.84
8/26/2013	1.81	1.81	1.89
8/27/2013	1.81	1.84	1.82
8/28/2013	1.82	1.84	1.80
8/29/2013	1.86	1.84	1.81
8/30/2013	1.82	1.82	1.81
9/3/2013	1.82	1.84	1.85
9/4/2013	1.83	1.86	1.84

9/5/2013	1.85	1.82	1.84
9/6/2013	1.85	1.84	1.81
9/7/2013	1.85	1.83	1.81
9/9/2013	1.84	1.81	1.85
9/10/2013	1.84	1.82	1.84
9/11/2013	1.81	1.85	1.84
9/12/2013	1.84	1.83	1.84
9/13/2013	1.82	1.83	1.82
9/16/2013	1.80	1.83	1.81
9/17/2013	1.83	1.84	1.87
9/18/2013	1.85	1.84	1.82
9/19/2013	1.83	1.84	1.83
9/20/2013	1.82	1.83	1.83
9/23/2013	1.83	1.84	1.81
9/24/2013	1.85	1.84	1.81
9/25/2013	1.85	1.83	1.84
9/26/2013	1.85	1.83	1.84
9/27/2013	1.82	1.81	1.80
9/28/2013	1.81	1.83	1.84
9/30/2013	1.81	1.80	1.81
10/1/2013	1.80	1.81	1.79
10/2/2013	1.80	1.81	1.82
10/3/2013	1.80	1.79	1.81
10/4/2013	1.80	1.79	1.82
10/5/2013	1.84	1.83	1.81
10/7/2013	1.79	1.80	1.79
10/8/2013	1.83	1.80	1.77
10/9/2013	1.80	1.77	1.78
10/10/2013	1.79	1.79	1.81
10/11/2013	1.82	1.80	1.81
10/12/2013	1.79	1.83	---
10/14/2013	1.81	1.79	1.79
10/15/2013	1.80	1.79	1.78
10/16/2013	1.80	1.78	1.79
10/17/2013	1.80	1.78	1.76
10/18/2013	1.79	1.78	---
10/21/2013	1.79	1.77	1.78
10/22/2013	1.77	1.78	1.77
10/23/2013	1.78	1.78	1.79
10/24/2013	1.76	1.78	1.77
10/25/2013	1.78	1.78	1.79

10/26/2013	1.77	1.81	1.80
10/27/2013	1.82	1.79	1.78
10/28/2013	1.81	1.83	1.81
10/29/2013	1.81	1.82	1.81
10/30/2013	1.79	1.83	1.81
10/31/2013	1.81	1.82	1.80
11/1/2013	1.79	1.80	1.82
11/4/2013	1.84	1.85	1.83
11/5/2013	1.82	1.81	1.80
11/6/2013	1.84	1.86	1.84
11/7/2013	1.81	1.81	1.84
11/8/2013	1.81	1.85	1.81
11/11/2013	1.88	1.85	1.85
11/12/2013	1.84	1.81	1.78
11/13/2013	1.83	1.81	1.78
11/14/2013	1.86	1.79	1.79
11/15/2013	1.80	1.78	1.81
11/18/2013	1.83	1.82	1.79
11/19/2013	1.78	1.80	1.81
11/20/2013	1.79	1.78	1.76
11/21/2013	1.78	1.81	1.78
11/25/2013	1.74	1.75	1.75
11/26/2013	1.75	1.78	1.80
11/27/2013	1.79	1.81	1.78
12/2/2013	1.82	1.80	1.81
12/3/2013	1.71	1.68	---
12/4/2013	1.87	1.72	---
12/5/2013	1.76	1.75	1.76
12/6/2013	1.77	1.72	1.75
12/9/2013	1.70	1.71	1.79
12/10/2013	1.72	1.78	1.81
12/11/2013	1.75	1.72	1.74
12/12/2013	1.76	1.74	1.75
12/13/2013	1.71	1.69	1.30
12/14/2013	1.75	1.78	1.80
12/15/2013	1.77	1.76	1.81
12/16/2013	1.71	1.73	1.71
12/17/2013	1.72	1.72	---
12/18/2013	1.71	1.74	1.71
12/19/2013	1.69	1.71	---
12/20/2013	1.69	1.70	---

12/23/2013	1.77	1.76	---
12/26/2013	1.75	1.76	---
12/27/2013	---	1.71	1.74
12/30/2013	---	1.72	---
1/2/2014	1.72	1.71	1.75
1/3/2014	1.77	1.77	1.77
1/7/2014	1.78	1.74	1.72
1/8/2014	1.73	1.74	1.72
1/9/2014	1.70	1.71	1.73
1/10/2014	1.69	1.71	1.79
1/13/2014	1.86	1.81	1.91
1/20/2014	1.96	1.87	1.89
1/21/2014	1.85	1.83	1.86
1/22/2014	1.84	1.83	1.80
1/23/2014	1.80	1.81	1.83
1/24/2014	1.97	1.96	1.82
1/27/2014	1.84	1.83	1.82
1/28/2014	1.83	1.86	1.80
1/29/2014	1.80	1.82	1.77
1/30/2014	1.79	1.87	1.88
1/31/2014	1.72	1.75	1.76
2/3/2014	1.82	1.86	1.83
2/4/2014	1.81	1.92	1.91
2/6/2014	---	1.80	1.81
2/10/2014	1.79	1.67	1.69
2/11/2014	1.75	1.71	1.68
2/12/2014	1.69	1.69	1.68
2/13/2014	1.65	1.59	1.63
2/14/2014	1.67	1.69	1.69
2/17/2014	1.74	1.73	1.75
2/18/2014	1.73	1.58	1.61
2/19/2014	1.74	1.75	1.58
2/20/2014	1.68	1.63	1.61
2/24/2014	1.64	1.65	1.67
2/25/2014	1.78	1.57	1.64
2/26/2014	1.71	1.55	1.59
3/3/2014	1.68	1.74	1.61
3/4/2014	1.65	1.78	1.77
3/6/2014	1.78	1.65	1.73
4/24/2014	1.85	1.87	1.83
4/28/2014	1.81	1.82	1.83

4/29/2014	1.84	1.85	1.83
4/30/2014	1.82	1.79	1.81
5/1/2014	1.85	1.85	1.89
5/5/2014	1.86	1.82	1.79
5/9/2014	1.71	1.68	1.69
5/10/2014	1.69	1.71	1.70
5/13/2014	1.69	1.70	1.71
5/14/2014	1.77	1.77	1.73
5/15/2014	1.81	1.77	1.78
5/16/2014	1.79	1.86	1.82
5/18/2014	1.79	1.80	1.78
5/19/2014	1.77	1.75	1.81
5/20/2014	1.85	1.88	1.91
5/27/2014	1.89	1.87	1.81
5/29/2014	1.90	1.87	1.89

**Table 2:** Scrubber pressure drop in inches water column (in. w.c.) for periods of time between May 31, 2013 and May 31, 2014 when at least one shift reading was greater than 9.15 in. Scrubber pressure drop was greater than 9.15 in. w.c. for 219 days.

Date	Scrubber Pressure Drop (in. w.c.)		
	Shift 1 Reading	Shift 2 Readings	Shift 3 Reading
5/31/2013	12.2	12.3	12.2
6/1/2013	12.0	12.5	12.1
6/2/2013	12.1	12.4	12.2
6/3/2013	12.3	12.3	12.1
6/4/2013	12.2	12.4	12.3
6/5/2013	12.2	12.3	---
6/6/2013	12.3	12.1	12.2
6/7/2013	12.1	12.1	12.2
6/8/2013	12.1	12.2	---
6/10/2013	12.1	12.2	12.1
6/11/2013	12.0	12.1	12.0
6/12/2013	11.9	11.9	---
6/14/2013	12.1	12.2	12.3
6/15/2013	12.2	12.0	12.1
6/16/2013	12.5	12.1	12.0
6/18/2013	12.2	12.2	12.2
6/19/2013	12.1	12.3	12.2
6/20/2013	12.1	12.2	12.1

6/21/2013	12.0	12.1	12.3
6/22/2013	12.0	12.1	---
6/24/2013	12.4	12.1	12.0
6/25/2013	11.9	12.0	12.1
6/26/2013	11.9	12.0	11.9
6/27/2013	11.8	11.9	11.8
6/28/2013	11.9	12.1	12.1
6/29/2013	12.0	12.0	11.9
7/1/2013	12.1	12.0	12.4
7/2/2013	12.5	12.4	12.1
7/3/2013	12.2	12.2	12.3
7/8/2013	13.0	12.6	12.4
7/9/2013	12.0	12.2	12.1
7/10/2013	12.1	12.1	12.2
7/11/2013	12.1	12.4	---
7/12/2013	12.5	12.4	12.6
7/13/2013	12.3	12.5	12.4
7/15/2013	12.3	12.4	12.5
7/16/2013	12.2	12.1	12.4
7/17/2013	12.2	12.2	12.1
7/18/2013	12.3	12.4	12.3
7/19/2013	12.2	12.4	---
7/22/2013	12.3	12.4	12.3
7/23/2013	12.0	12.2	12.5
7/24/2013	12.5	12.4	12.2
7/25/2013	12.3	12.2	12.1
7/26/2013	12.2	12.4	12.4
7/27/2013	12.3	12.4	12.5
7/29/2013	12.3	12.5	12.4
7/30/2013	12.2	12.2	12.3
7/31/2013	12.2	12.3	12.1
8/1/2013	12.2	12.3	12.4
8/2/2013	12.1	12.2	---
8/5/2013	12.4	12.2	12.1
8/6/2013	12.2	12.0	12.2
8/7/2013	12.3	12.1	12.2
8/8/2013	12.0	12.2	12.1
8/9/2013	12.3	12.4	12.4
8/12/2013	12.3	12.1	12.2
8/13/2013	12.2	12.6	12.5
8/14/2013	12.4	12.6	12.4

8/15/2013	12.2	12.5	12.3
8/16/2013	12.4	12.2	12.3
8/19/2013	12.4	12.4	12.2
8/20/2013	12.3	12.4	12.3
8/21/2013	12.5	12.4	12.1
8/23/2013	12.4	12.1	12.3
8/26/2013	12.6	12.4	12.2
8/27/2013	12.3	12.3	12.1
8/28/2013	12.3	12.3	12.1
8/29/2013	12.4	12.3	12.4
8/30/2013	12.4	12.3	12.2
9/3/2013	12.2	12.3	12.4
9/4/2013	12.3	12.4	12.2
9/5/2013	12.4	12.2	12.3
9/6/2013	12.4	12.3	12.1
9/7/2013	12.3	12.2	12.0
9/9/2013	12.1	12.4	12.5
9/10/2013	12.0	12.1	12.3
9/11/2013	12.1	12.1	12.3
9/12/2013	12.2	12.3	12.3
9/13/2013	12.1	12.2	12.4
9/16/2013	13.0	12.7	12.5
9/17/2013	12.7	12.7	12.6
9/18/2013	12.8	12.6	12.7
9/19/2013	13.0	12.8	12.7
9/20/2013	12.8	12.8	12.6
9/23/2013	12.4	12.3	12.2
9/24/2013	12.1	12.2	12.0
9/25/2013	12.3	12.2	12.4
9/26/2013	12.5	12.4	12.5
9/27/2013	12.3	12.1	12.0
9/28/2013	12.1	12.3	12.2
9/30/2013	12.4	12.4	12.4
10/1/2013	12.3	12.4	12.3
10/2/2013	12.2	12.1	12.3
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10/5/2013	12.4	12.1	12.3
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10/10/2013	12.4	12.5	12.2
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10/12/2013	12.3	12.2	---
10/14/2013	12.3	12.4	12.5
10/15/2013	12.2	12.3	12.2
10/16/2013	12.4	12.5	12.4
10/17/2013	12.3	12.4	12.4
10/18/2013	12.4	12.4	---
10/21/2013	12.3	12.5	12.5
10/22/2013	12.4	12.3	12.4
10/23/2013	12.5	12.4	12.5
10/24/2013	12.6	12.3	12.4
10/25/2013	12.1	12.4	12.4
10/26/2013	12.3	12.0	12.1
10/27/2013	12.2	12.4	12.5
10/28/2013	12.5	12.6	12.6
10/29/2013	12.4	12.3	12.1
10/30/2013	12.2	12.3	12.1
10/31/2013	12.0	12.3	12.2
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11/4/2013	12.2	12.5	12.4
11/5/2013	12.3	12.3	12.5
11/6/2013	13.0	13.0	12.8
11/7/2013	12.3	12.3	12.8
11/8/2013	13.4	13.1	13.5
11/11/2013	13.3	13.4	13.2
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11/13/2013	13.2	12.9	12.8
11/14/2013	12.9	12.5	13.1
11/15/2013	13.1	12.9	12.7
11/18/2013	13.2	13.0	13.0
11/19/2013	12.9	12.9	12.8
11/20/2013	12.8	12.8	12.6
11/21/2013	13.1	12.9	12.9
11/25/2013	12.7	12.8	12.5
11/26/2013	12.8	12.9	13.1
11/27/2013	12.8	12.7	12.8
12/2/2013	13.0	13.1	13.0
12/3/2013	12.8	12.4	---
12/4/2013	12.4	12.5	---
12/5/2013	12.5	12.7	12.8

12/6/2013	12.6	12.4	12.7
12/9/2013	13.0	13.1	12.7
12/10/2013	12.8	12.6	12.4
12/11/2013	12.5	12.6	12.5
12/12/2013	12.5	12.6	12.7
12/13/2013	12.8	12.6	12.4
12/14/2013	12.3	12.5	12.1
12/15/2013	12.0	11.9	12.1
12/16/2013	12.5	12.8	12.6
12/17/2013	12.5	12.2	---
12/18/2013	12.5	12.4	12.6
12/19/2013	12.4	12.5	---
12/20/2013	12.1	12.0	---
12/23/2013	12.8	12.8	---
12/26/2013	12.7	12.8	---
12/27/2013	---	12.4	12.3
12/30/2013	---	12.4	---
1/2/2014	13.0	13.1	12.0
1/3/2014	12.6	12.1	12.3
1/7/2014	12.1	12.4	12.4
1/8/2014	12.2	12.4	12.3
1/9/2014	12.5	12.4	12.3
1/10/2014	12.2	12.3	12.1
1/13/2014	12.3	12.4	12.5
1/14/2014	12.5	12.4	12.4
1/15/2014	13.0	12.8	12.7
1/16/2014	12.8	12.9	12.7
1/17/2014	12.7	12.8	12.2
1/20/2014	12.2	12.3	12.2
1/21/2014	12.5	12.4	12.5
1/22/2014	12.5	12.1	12.3
1/23/2014	13.0	12.9	12.8
1/24/2014	13.0	13.5	13.0
1/27/2014	13.0	12.8	13.0
1/28/2014	13.0	13.0	12.9
1/29/2014	12.9	13.1	12.9
1/30/2014	12.9	12.7	12.7
1/31/2014	12.6	12.5	12.9
2/3/2014	12.0	12.6	12.0
2/4/2014	12.0	12.1	12.3
2/5/2014	12.1	12.2	12.5

2/6/2014	---	12.3	12.2
2/10/2014	13.0	12.6	12.8
2/11/2014	12.6	12.5	12.2
2/12/2014	12.2	12.2	12.5
2/13/2014	12.1	12.2	12.1
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2/17/2014	12.4	12.5	12.6
2/18/2014	12.4	12.3	12.7
2/19/2014	12.2	12.1	12.2
2/20/2014	12.3	12.4	12.3
2/24/2014	12.2	12.1	12.4
2/25/2014	12.1	12.3	12.4
2/26/2014	12.5	12.3	12.1
3/3/2014	12.4	12.3	12.4
3/4/2014	12.6	12.8	12.4
3/6/2014	12.0	12.3	12.1
4/24/2014	12.4	12.1	12.5
4/28/2014	12.2	12.1	12.4
4/29/2014	12.2	12.2	12.3
4/30/2014	12.3	12.5	12.5
5/1/2014	13.0	12.5	12.5
5/5/2014	12.5	12.4	12.4
5/9/2014	12.4	12.7	12.7
5/10/2014	12.7	12.6	12.7
5/13/2014	12.8	12.7	12.5
5/14/2014	12.4	12.5	12.3
5/15/2014	12.6	12.7	12.7
5/16/2014	12.6	12.5	12.6
5/18/2014	12.8	12.7	12.6
5/19/2014	12.3	12.9	12.5
5/20/2014	12.8	12.6	12.7
5/21/2014	12.8	12.6	12.4
5/22/2014	12.7	12.6	12.5
5/23/2014	12.8	12.7	12.6
5/27/2014	12.7	12.5	12.4
5/28/2014	12.9	12.5	12.4
5/29/2014	12.6	12.1	12.3

**CERTIFICATE OF MAILING**

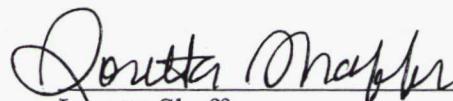
I, Loretta Shaffer, certify that I sent a Notice of Violation, No. EPA-5-15-IL-16 by Certified Mail, Return Receipt Requested, to:

John DuBrock  
Director of Operations  
NACME Steel Processing, L.L.C.  
429 West 127<sup>th</sup> Street  
Chicago, Illinois 60628

I also certify that I sent copies of the Notice of Violation by first-class mail to:

Ray Pilapil, Manager  
Compliance Section  
Bureau of Air  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
Springfield, Illinois 62794-9276

On the 21 day of September 2015.



Loretta Shaffer  
Program Technician  
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7014 2870 0001 9581 3079